

Commonwealth of Massachusetts
Department of Telecommunications and Energy
Fitchburg Gas and Electric Light Company
Docket No. D.T.E. 02-24/25
Record Request Response

Record Request No.: AG-RR-48 (Electric)

In response to cross examination, you said your load data "stems from our 1990 rate design case." Doesn't that mean that the sample was derived and the original data was collected prior to 1990? You stated that the 1998 data still provided statistically valid results. Were those results actually tested in some way against 2001 electric use? Were you able to use that 1998 data and project each month's peak use fairly accurately? Please provide any tests of the validity of this data in predicting 2001 load, for peak as well as energy. Is it your testimony that the sample and the data it produced did not deteriorate from when it was developed in 1988 or 89 to 1998, but it has deteriorated from 1998 to 2001?

Response:

As stated in AG-RR-23 (Electric), the current load research sample was installed in 1993. It is not the sample that was used for the 1990 rate design case.

The 1998 sample results were not tested against 2001 electric use. The Electric Division made no attempt to use 1998 data to project each month's peak use. Rather, the quantities which were known, the total Electric Division 2001 hourly loads and GD-3 and GD-4 2001 hourly loads were used in combination with 1998 load research hourly loads for the residential and general service classes to estimate 2001 residential and general service class hourly loads. Actual monthly peak data was used for the electric division and GD-3 and GD-4 classes. The remaining classes were calculated as described in AG-RR-22 (Electric). 1998 data was not used to predict 2001 loads, but was rather used only for the residential and general service classes to estimate 2001 hourly loads.

It is my testimony that load research samples are designed at a point in time to reflect the mix of customers, locations, and energy and demand usage in place at the time the sample is drawn. From that day forward, some deterioration of the sample is expected to occur. From the time a sample is drawn to the time the meter is installed in the field, there may have been changes in the demographics of one or more of the sample locations. For example, a residential customer may have moved or a commercial customer may have closed or expanded their business. These changes are common and affect the freshness and accuracy of the sample. So in effect, some deterioration of the sample is common and will affect the results of the samples. That said, there was some deterioration of the sample between 1993 and 1998 which affected the accuracy of the results, but not so much as to render them unusable. It was determined that for 1999, the samples had further deteriorated to the point where the number of usable data points no longer provided statistically accurate results. As discussed in AG-RR-23 (Electric) the load research has not been a major focus in recent years as personnel normally assigned to these tasks have been utilized in meeting the requirements of FG&E in other areas.

Person Responsible: Karen M. Asbury